I.S. & KICHARDSON P.C.

225 Franklin Street Boston, Massachusetts 02110-2804

Telephone 617 542-5070

Facsimile 617 542-8906

Web Site www.fr.com

Frederick P. Fish 1855-1930

W.K. Richardson 1859-1951

January 10, 2003

Samuel C. Miller, III Burns, Doane, Swecker & Mathis, LLP P.O. Box 1404 Alexandria VA 22313-1404

RE: United States Patent Application Publication 2001/0032559, October 25, 1991 "Inking Systems For Printing Presses"; Price et al.

Dear Mr. Miller:

I am writing on behalf of Mr. James E. Taylor, who directed research and development activities for Dahlgren Manufacturing Co. and Dahlgren International Co. and subsequently served in sales administration and as technical manager for Dahlgren USA. Mr. Taylor then worked as requested for Dahlgren International. Mr. Taylor is presently fully retired from Dahlgren.

Mr. Taylor developed concepts for keyless inking systems in the late 1980's and the early and mid 1990's. I enclose documentation of some of those concepts. The enclosed document is a facsimile transmitted from Mr. Taylor to Mr. Paul Belair on August 3, 1995, including a cover sheet and a memorandum dated August 2, 1995 titled "New Inker Project". The memorandum is from Mr. Taylor to Mr. Belair, Mr. James F. Price and Mr. Mark DiRico. The facsimile cover sheet references Mr. Taylor's sketches that Mr. Price had delivered to Mr. Belair "yesterday", which, we believe, was August 2, 1995.

In summary, Mr. Taylor is responsible for the concepts in the August 2, 1995 memorandum, and he transmitted his ideas to Mr. Price and others.

I have studied just one of Mr. Taylor's concepts (the "Alternative Ink Metering Methods", illustrated in the figure that is on the last page of the memorandum, and is reproduced below).



BOSTON

DALLAS

DELAWARE

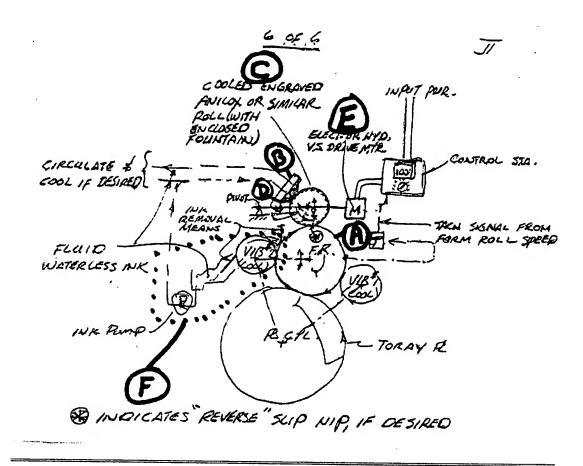
NEW YORK

SAN DIEGO

SILICON VALLEY

TWIN CITIES

WASHINGTON, DC



The table below compares Mr. Taylor's alternative ink metering methods, shown in the figure at page 6 of the memorandum, to claim 20 of the above-captioned US 2001/32559. The memorandum remains unchanged from August 1995, except that I have added letters referenced in the table to identify certain features in the figure on page 6.

Claim 20 of '559 Publication	8/2/95 Memorandum
A keyless inking system comprising:	The entire memorandum concerns keyless inking systems. See, for example, the introduction under "III. Goal" which references "keyless inking systems, especially w/viscous inks"
a single form roller;	The page-6-figure shows a single form roller, which I have labeled "A".

Claim 20 of '559 Publication (cont.)	8/2/95 Memorandum (cont.)
an ink reservoir;	The page-6-figure shows an ink reservoir, which I have labeled "B"
an applicator roller for applying ink to the form roller, the surface of the applicator roller having wells, which are interconnected by channels;	The page-6-figure shows an applicator roller, which I have labeled "C", for applying ink to form roller A. The applicator roller is specified as an "engraved anilox or similar roll" In addition, the bottom of the page-6-figure, the roll is characterized as "like LPC". This is a Dahlgren short hand well known to both Mr. Taylor, Mr. Price and others as the "litho plus coater", as described in U.S. patents 4,934,305and 5,178,678. As detailed in those patents and as was well known to those familiar with the LPC, the anilox roll used is manufactured by Pamarco and has a "roto-flo engraved surface" which has channels that interconnect the wells.
a doctor blade for metering ink from the reservoir onto the applicator roller; and	The page-6-figure shows a doctor blade "D" for metering ink from the reservoir onto applicator roller C.
means for varying the rotational speed of the applicator roller to vary the amount of ink applied to the form roller.	Applicator roller C is driven by an "ELECT. OR HYD. V.S. DRIVE MTR", i.e., an electric or hydraulic variable speed drive motor, which I have labeled "E".

As shown above, there is no question that Mr. Taylor is at least a co inventor of the subject matter claimed in the '559 publication.

In addition to what is shown above, my conversations with Mr. Taylor indicate that there are many more instances of information that Mr. Price derived from Mr. Taylor and included in the claims of this application, but I want to keep this exchange brief and to the point.

One example relates to claim 22 of the '559 publication featuring a subtractive roller system. The page-6-figure shows a subtractive roller system (which I have labeled "F") for removing excess ink from the form roller.

Relative to claim 23, the ink reservoir B in the page-6-figure receives excess ink from subtractive roller system F. Relative to claim 29, the speed of the applicator roller C in the page-6-figure may be increased or decreased with drive motor E to change the amount of ink applied to form roller A. Note the figure specifies a VS (variable speed) motor

Samuel C. Miller, III Page 4

Based on the information above, please add Mr. Taylor as a co inventor to this application.

I look forward to your response.

Very truly yours,

John W. Freeman, Esq.

JWF/nxp

TREASMISSION REPORT one of the Island PEF. MANE: MULE DER: 16174247483 PAGES SENT: DURATION: 04:56 617/121-7483(FA) NUMBER OF PAGES INCLUDING THIS ONE 7 RE: BOMISHED FAX Dear faul
This is insmove reachable from and a summar
of all the chetches fin of brought to you yesterday.

Phase call if your have questions.

IF THIS FAX DOES NOT TRANSMIT CLEARLY OR ALL PAGES ARE NOT RECEIVED, PLEASE CALL (214) 245-0035.

DAHLGREN® • P.O. BOX 115140 • CARROLLTON, TEXAS 75011-5140

DAHLGREN.

FAX NO. (214) 245-0768

DATE: 8/3/95	
TO: <u>MESTIN HOTEL (COPLEY PLAC</u>	
ATTN: PAUL BELAIR (HOTEL G FAX NO. 617/424-7483 PERS.	OWAL & CONFIDENTIFIC)
FROM: JIM TAYCOR	617/262-9600 (PH)
NUMBER OF PAGES INCLUDING THIS ONE	11/421-7483 (FAX)
Dear Faul	RE: BOMISHED FAX
This is insmove readable of all the exetches Jim P. bro Please call if you have que	e from and a summary ught to you yesterday. I
	Gen Just

IF THIS FAX DOES NOT TRANSMIT CLEARLY OR ALL PAGES ARE NOT RECEIVED, PLEASE CALL (214) 245-0035.

DAHLGREN® • P.O. BOX 115140 • CARROLLTON, TEXAS 75011-5140

To: Paul/Mark/Jim

June E. Taylor. Aug. 2, 1995

FROM: J.E. TAYLOR

CONFIDENTIAL

SUBJECT: PRINTING PRESS SINGLE ROLL INVER "

(KEYLESS / WATERIESS) KENESS

I. AMANTREES & BENEFITS QUEL PRIOR DAHLGRENIS INVER

A. FROM THIS DAY FORWARD

1. OFFERS ALL ADVANTAGES OF WATERLESS PRINTING (W/O DAMPENER)

a) INK-WATER BACANCE NOT READ.

b) FAST MAKE-READY-LESS START-LEP WASTE

C) LESS SPOILAGE THRU THE RUN

d) INCREASED PRODUCTIVITY

I) FINE SCREENS CAN BE RUN TO 500 LPI.

SEXULED WORKERS NOT READ.

g) LESS OOT GAIN-THINNER INK FILMS

Ph) SHARPER PRINTING

i) NO CAMPENER, DAMPENING CHEMISTRY, etc.

J) LESS DRY BACK PROBLEMS

K) LESS COMPLICATED PROCESS-INK IS ONLY VARIABLE

LI HIGHER INK CARRIES

M) ADVANTAGES WI NON-ABSORBENT SUBSTRATES

M) CONSISTANT COLOR

0) LESS REGISTER PROBLEMS W/O WATER

P) CAN PROCESS ALMOST ALL PEPER GRADES + CARTONS.

9) CON VISCOSITY INKS & TEMP. CONTROL ALLOW UNCOATED STOCKS TO BE PRINTED.

2. ADVANTAGES SPECIFIC TO DAHLGREN DESIGNSO a) WATER-LESS (NO DAMPENER OR WATER-INK

D) INK FORM ROLL DAMAGE & DETERIORATION ELIMINATED (BLADE METERING & REVERSE

ROLL METERING ELIMINATED)

C) FORM ROLL DRIVE IS SIMPLIFIED & SMOTH

d) EXISTING INKER TRAMES USED

2) SIMPLE - INESPENSIVE 1

A) CAN HAVE TEST UNIT QUICKLY ON GOOD?

9) EXISTING PRESS INK VIBRATORS USED N) " " INKER USED (WHEN MODIFIED) L) COULD RETROFIT EXISTING PRESSES MORE EASILY, IF DESIRED.

II. THE ABOVE ADVANTAGES CAN BE OBTAINED & HERE'S SOME, IDEAS THOUGHTS DATING BACK TO THE EARLY 90'S & LATE 80'S!

A. START FRESH WIO MUDLUEMENT OF OLD INKER DESIGNS, OLD RAD PRESS WI INKER, OR PATENTS.

1) USE OLD INKER DESIGN DUES. ONLY AS READ. & AS

PROJECT PROGRESSES.

2.) SAME AS A) ABOVE FOR DID RED PRESS ENKER, 3.) FILE NEW PATENTS AS REQUIRED FOR PROTECTIONS OF NEW TECHNOLOGY USED (I WOULD LIKE THIS JOB) 4.) USE DID PATENTED TECHNOLOGY, AS NECESSARY, I OBTAIN LISCENSE FROM PATENT OWNER(S) ONLY WHEN IT IS SEEN THAT UNEXPIRED PATENTS ARE INCORPORATED WITO THE NEW DESIGN.

B. FOR TESTING I USE OF AN INKER OF A I MULTICOLOR 40" OR 50" PLANETA, MITSUBISHI, OR HARRY PRESS, DE. & REMOVE CERTAIN INK FORM, ROLLS, HANGERS, EK.
THIS MODIFIED INKER SAN BE USED TO METER & APPLY INK TO THE I FORM BOLL (INK KEYS LOCKED):
(SEE SKETCH) REMOVE THE DIMPENER-THIS IS A WATERIESS KEYLESS "INKER.

1.) RESULTS CAN BE COMPARED WITH THE CONVEN-TIONAL INVERTADAMPENER OF ANOTHER UNIT OF THE SAME PRESS.

2.) REMOVE THE PRESENT DAMPENER FROM THE UNIT TO BE TESTED.

3) REFLAIN FROM USING A REVERSE ANGLE INK METERING BLADE THAT HAS TO BE HEAVILY IN-DENTED INTO THE FORM ROLL FOR UNIFORMITY. 4) THE MODIFIED INKER SHOULD INCORPORDITE:

ON CHE MODIFIED INKER SHOULD INCORPORATES

ON CHE(I) HEW LARGE SINGLE INK FORM ROLL

ON PLOUNT FORM FOLL BETWEEN TWO(2) EXISTING

PRESS DRIVENILOS CYLLATING (VISRATOR) ROLLS;

WITH HEW FORM ROLL HANGER, PLUOTING ABOUT

ONE OF THE VIBRATORS. USE AIR CYLINEERSITE.

TO ACTUATE THE HANGER (WITH FORM ROLL)
"ON" & SLIGHTLY "OFF" THE PLATE-WITH DOSITIVELY
ADJUSTABLE STOPS.

C) ONE(1) NEW "SUBTRACTIVE" INK. REMOVAL DEVICE
DIRECTLY ON THE FORM ROLL (AFTER PRINTING),
OR, ON ONE OF THE VIBRATOR ROLLS, OR COMBINATION OF BOTH TO REMOVE ALL GHOSTING POSSIBILITIES,
OR INK ACCUMULATION - STARVATION POSSIBILITIES.

d) REROUTE ALL THE NUK FROM THE MODIFIED INKER INK TRAIN TO THE NEW SINGLE FORM ROLL \$/OR

ONE VIBRATOR (SEE SKETCH)

ING & ALSO A NEW "NON-STO!" WATERLESS INK FOR TEST-ING & ALSO A NEW "NON-STO!" WATERLESS INK WHICH IS LOW IN VISCOSITY.

B) PROVICE FOR COOLING OF THE TWO (2) INK
VIBRATORS OF THE INKER BEING USED FOR TESTING.

9) ADJUST INK KEYS FOR AN EVER INK FILM

4 THEN "LOCK" EACH ONE NEWER TO BE USED

AGAIN DURING TESTING

h) COLLECT & PUMP INK REMOVED FROM THE FORM POLL BACK TO THE INK FOUNTAIN, TO BE REUSED.

A) AFTER TESTING USING THE MODIFIED INKER FOR THE TERING INK TO THE FORM ROLL, REMOVE THE INK FOUNTAIN, DUCTOR & ALL INKER ROLLS & TRY OTHER METHODS OF METERING & RPPLYING INK TO THE NEW SINGLE INKING FORM ROLL. (SEE OTHER SKETCHES ENCLOSED)

C. COMBINATIONS OF TEST, POSSIBILITIES:

I. INK METERING

a) MODIFIED CONVENTIONAL INK FOUNTAIN

SEE SKETCHES CESCRIBED ABOVE

ATTACHED b) ANILOX ROLL WI ENCLOSED INK FOUNTAIN

OR WI METERING ROLL WI ANILOX ROLL

ADAPTED FOR FORWARD OR REVERSE ROTATION

*- C) INK METERING MEMBER (BLADE)
- WITH <u>LIMITED</u> THRESHOLD PRESSURE TO
FORM ROLL & CHANGE ANGLE ON BLADE

\$/OR ANGLE OF BLADE RELOTIVE TO ROLL FOR

INK FILM CONTROL.

2. INIR REMOVAL.

a) BLATE IN LIGHT FRESSLULE CONTACT TO F.R.

b) " ON ONE INK VIERATOR ROLL.

C) COMBINATION OF a) & b) ABOVE.

3. FORM ROLL DRIVE

a) THRU FRICTION FROM PRESS DIRIVER VIBRATORIS).

* b) CHOW (SILENT) OR GEAR DRIVE FROM PRESS.

(HOWEVER THESE CAN CAUSE STREARS; ESP. GEARS.)

C) INDEPENDENT MOTOR (AND. OR ELECTRIC)

WI TACH FOLLOWING (\$ TRIM) BACK TO PRESS.

d) VIBRATORS ABOVE (DEL a) PLUS C) HELPER" TO

APPLY CONSTANT TORQUE REQUIRED.

4. COMPENER

*- a) SAME AS ON OLD "INKER (1.2. TRANSFER ROLL CONTACTS F.R.)

*- b) MUST HAVE MEANS TO REMOVE \$ OR_
EVAPORATE OR MIX MIX & WATER AS PER
EXISTING INKER PATENTS; OR, USE NEWLY
DEVELOPED TECHNOLOGY!

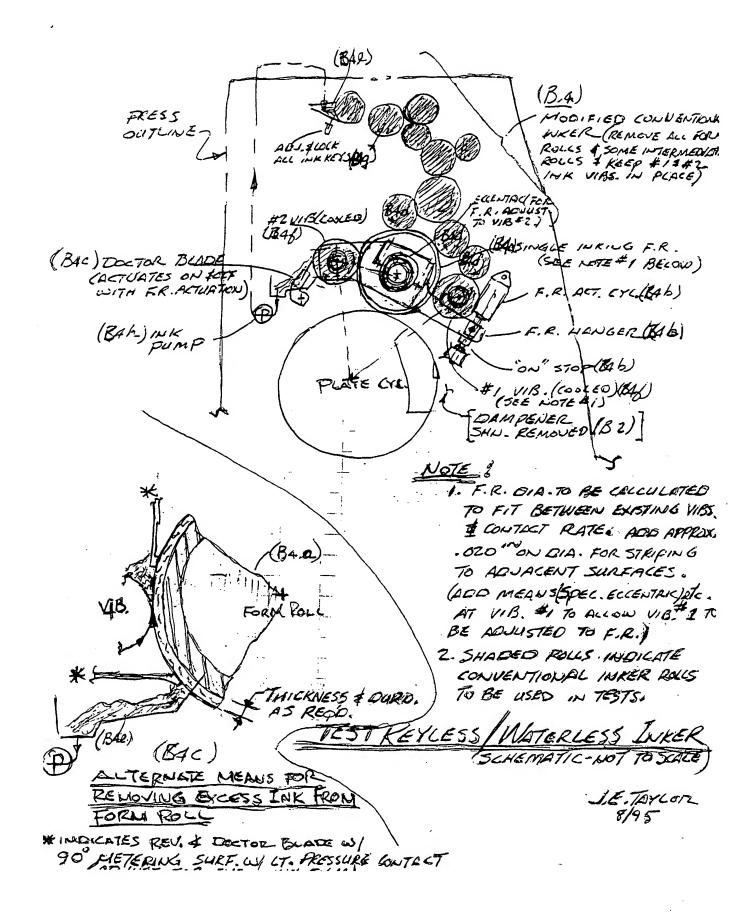
III. GOAL: THE FINAL PRODUCT SHOULD BE THE SYMPLEST SYS. TO DO THE JOB" & SHOLD WORK FOR ATTO FRESE

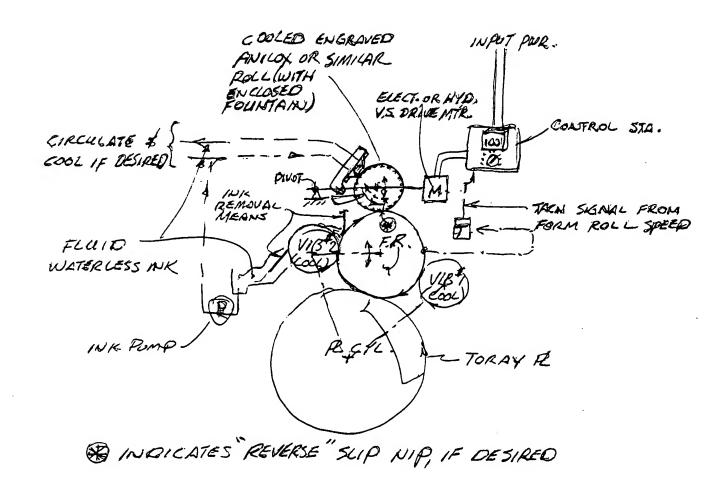
* I CAN PROVIDE OTHER DAHLGREN PATENTS FOR THIS MODE,

PLEASE .

THIS MAY SOUND LIKE BEAGGING (OR CONFESSING "PERHAPS),
BUT I PROBABLY KNOW MORE ABOUT KEYLESS INKING THAN
ANYONE, ESPECIALLY WIN VISCOUS INKS & CERTAINLY KNOW
A LOT OF THINGS NOT TO DO! I SPENT TEN(10) YRS. OF MY
LIFE ON THE YARIOUS KEYLESS INKING SYSTEMS DEVELOPED THRU
THE YEARS IN R&D & FILED ALL PATENTS, ETC. THE 10 YRS. WAS
ONGOING & EVERY DAY.

I WANT TO & CAN HELD IN DESIGNITESTING & EVALUATION & PATENTS
ALTHOUGH I CAN'T NOW WORK FELLY TIME AS BEFORE IF I CAN
BE OF HELP AS A CONSULTANT (OR WHATEVER) ID LIKE TO
BE INVOLVED. MY CONTRIBUTION CAN BE USING MY PAST, EX-





ALTERNATE METERING METHOD(S)

(MOUNTING FOR FORM ROLL &

ANILOX ROLL CAN BE MOUNTED &

ACTUATED IN COMMON FRAME & ACTUATED

& ARTUATED LIKE LPC" J.E. TAYLOR

IF DESIRED.)

8/95